Docket File



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

June 15, 1995

Mr. B. Ralph Sylvia Executive Vice President, Nuclear Niagara Mohawk Power Corporation Nine Mile Point Nuclear Station P.O. Box 63 Lycoming, NY 13093

# SUBJECT: NINE MILE POINT NUCLEAR STATION UNIT NO. 1 - REQUEST FOR CLARFICIATION AND FOR ADDITIONAL INFORMATION (TAC NO. M91221)

Dear Mr. Sylvia:

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PDR

The purpose of this letter is (1) to request clarification of your intent and basis for your license amendment proposal regarding instrument calibration frequency and fuel cladding integrity limits, and (2) to request additional information.

In a letter dated December 23, 1994, you submitted a request to amend the technical specifications for fuel cladding integrity limits and for certain instrumentation. A conference call on May 16, 1995, with D. Baker and others of your staff identified two areas of concern. The first involves a portion of the basis for your submittal. General Electric Report NEDC-31336, which the NRC staff has previously approved, permits an 18-month surveillance test interval for flow transmitters. However, Attachment C (GE-NE-208-22-1193) to your December 23, 1994, amendment submittal proposes a methodology permitting a 30-month surveillance test frequency for flow transmitters; the NRC staff has not previously approved such a methodology. Staff review of the latter methodology will take considerable time and will extend our review of your amendment proposal. We request you clarify whether it is your intent to rely upon the latter methodology, necessitating a significant expansion of our review.

The second area of concern identified in the conference call is the need for additional information. Specific questions are included in the enclosure. These questions were provided to D. Baker of your staff on June 2, 1995.

This requirement affects 9 or fewer respondents and, therefore, is not subject to the Office of Management and Budget Review under P.L. 96-511.

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B. Sylvia

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Please provide your response by July 15, 1995, so that we can continue our review consistent with your schedular needs.

Sincerely,

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Gordon E. Edison, Senior Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-220

Enclosure: Request For Additional Information

cc w/encl: See next page

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B. Ralph Sylvia Niagara Mohawk Power Corporation

cc:

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Mr. Martin J. McCormick, Jr. Vice President Nuclear Safety Assessment and Support Niagara Mohawk Power Corporation Nine Mile Point Nuclear Station P.O. Box 63 Lycoming, NY 13093

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## REQUEST FOR ADDITIONAL INFORMATION FOR

# NINE MILE POINT NUCLEAR STATION\_UNIT\_NO. 1

### TECHNICAL SPECIFICATION CHANGE REQUEST

#### DATED DECEMBER 23, 1994

### <u>Attachment A</u>

<u>Section 2.1.2</u>

The word "trip setting" is changed to "analytical limit" in the "specification" part and not in the "applicability" part of this section. The relationship provided in the specification only established the nominal trip set point, same as the "limiting Safety System Setting," and allowable value, without identifying the analytical limit. Does the General Electric (GE) calculation establish the analytical limit, and what are those values for APRM flow biased scram and rod block? The proposed changes to the bases for 3.6.2 and 4.6.2 indicate that the set point definition includes a value for the analytical limit. This statement does not define and provide the value of analytical limit.

#### <u>Table 4.6.2a</u>

Although not identified as "biased by recirculation flow," the APRM upscale trip parameter is understood to be the same as in Table 4.6.2g. Please confirm and make the necessary change if appropriate.

#### <u>Attachment B</u>

- (1) Evaluation-paragraph 4: How were the drift data for transmitters, square rooter and summer extrapolated to a minimum of 15 months and combined with the 3 month drift values for the flow trip units to establish the new setpoint? Please identify the appendices that include these operations.
- (2) Conclusion, paragraph 2 states that the APRM and recirculation flow instrumentation system will continue to be calibrated every 3 months except the flow transmitters, square rooters and summers, while the last paragraph of the no significant hazard analysis states that the <u>trip</u> <u>units</u> in APRM and recirculation flow instrumentation system will continue to be calibrated every 3 months. Does the "instrumentation system" in paragraph 2 mean trip unit?

In addition, the second paragraph of the conclusion states that the entire APRM and recirculation flow instrumentation system will still be subject to the instrument channel tests every 3 months. If this test is a channel functional test then it may not include components such as the

Enclosure

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transmitter and comparator and will not complement the channel calibration. Please clarify these statements.

## Attachment C

# Calculation A. Table 1

"New" drifts are the observed values listed in the appendices. A larger instrument setpoint drift during a specific surveillance test interval (STI) behooves a shorter STI to ensure the setpoint remains within the allowable value. The STI for the first three components in the table should apparently be reduced instead of being increased (transmitter STI is increased ten fold) from the existing quarterly schedule. Please discuss.

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B. Sylvia

June 15, 1995

Please provide your response by July 15, 1995, so that we can continue our review consistent with your schedular needs.

Sincerely.

Original signed by:

Gordon E. Edison, Senior Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-220

Enclosure: **Request For Additional** Information

cc w/encl: See next page

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